

IN THE UNITED STATES BANKRUPTCY COURT  
THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

Dusty - (Bankruptcy)  
Lodged - (EDHO)  
August 22, 2003  
Elizabeth

SFUND RECORDS CTR  
2270580

IN THE MATTER OF

STOODY COMPANY,

Debtor.

Chapter 11

No. 01-52847-399

SETTLEMENT AGREEMENT

WHEREAS, on or about November 19, 2001, the Debtor herein filed a petition for reorganization under Chapter 11 of Title 11 of the United States Code, 11 U.S.C. § 101, et seq., as amended (the "Bankruptcy Code");

WHEREAS on November 26, 2001, this case was consolidated with other associated cases numbered 01-52840 through 01-52860, pursuant to an Order for Joint Administration;

WHEREAS, on or about May 17, 2002, the United States, on behalf of the Environmental Protection Agency (the "EPA"), filed a Proof of Claim against Stooddy Company (the "Debtor");

WHEREAS, the proof of claim (No. 2354) asserts a claim relating to the obligations and liabilities of the Debtor pursuant to the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA"), 42 U.S.C. § 9601 et seq., for at least \$16 million in unreimbursed environmental